

THE MARK LAW FIRM, LLC

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Jamison M. Mark, Esq.^{vΔ}
Kristofer P. Guldner, Esq. ^v
Michael D. Russo IV, Esq.^v
Craig Voorhees, Esq. ^{v•}
Jordan B. Dascal, Esq.^{v†‡}
Michael D. Russo, III, Esq.^{v†}

♦New York Bar
*New Jersey Bar
ΔNorth Carolina Bar
†Of counsel
●Counsel

Main Office
675 Morris Avenue, Suite 300
Springfield, New Jersey 07081
973.845.6606 (Main)
973-232-5744 (Direct)

May 10, 2024

VIA ECF only

The Honorable Andre M. Espinosa, USMJ
Martin Luther King Jr, Fed. Building
& U.S. Courthouse
50 Walnut Street, Courtroom MLK 2D
Newark, New Jersey 07101

RE: Ramirez Rodriguez v. West New York Board of Ed., et al.
Civil Action No. 18-cv-17081(JMV-MF)
File No. JMM-E1374.21

Dear Judge Espinosa:

As Your Honor is aware, I represent Gisela Ramirez-Rodriguez. On April 18, 2024 we appeared before Your Honor for our second settlement conference, which resulted in an agreement on terms and conditions of settlement subject to the BOE vote. The BOE vote was to be held on May 6th, carried then to May 7, 2024, during its regular working session meeting, however, the Board did not vote on this settlement but carried the vote for another, later date. The Board's next meeting is set for June 12, 2024. I do not know if the Board is voting on this matter at the June 12, 2024 board meeting.

As such, I request that Your Honor vacate its 60-day order as it will be impossible for the BOE to come to an agreement to accept or reject this settlement, but then allow adequate time to negotiate and execute closing documents, all prior to the expiration of the 60 days or by June 18, 2024.

As such, I respectfully request that Your Honor vacate the April 18, 2024 "60-day" order, and reopen the matter.

Respectfully,
THE MARK LAW FIRM



JAMISON M. MARK

JMM/dmc
cc : Dennis Schmieder, Esq.

130 Bloomfield Avenue
Hoboken, New Jersey 07030
201-787-9406

661 Franklin Avenue
Suite 1A
Nutley, New Jersey 07110
973-845-6606

68 N. Bridge Street
Suite 1A
Somerville, New Jersey 08876
908-626-1001